

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

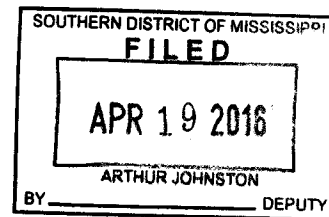
UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:16 CI30 HTW-LRA*

SACHIN GIRISHKUMAR PATEL,
TARUNKUMAR PURUSHOTTAMBHAI PATEL,
SIMPSON LLOYD GOODMAN,
IVORY LEE HARRIS,
SANJAY RATHILAL PATEL,
MAHESHKUMAR MANGALDAS PATEL,
ASHABEN MUKESHBHAI PATEL,
RAJAN NARESHKUMAR PATEL,
GOPALDAS KHODABHAI PATEL,
SACHIN KHODIDAS PATEL, and
BALDEVBHAI RAMABHAI PATEL

18 U.S.C. § 371
18 U.S.C. § 1341
18 U.S.C. § 1343
18 U.S.C. § 1546



The Grand Jury charges:

At all times relevant to this indictment:

1. In Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SIMPSON LLOYD GOODMAN**, was an attorney who represented aliens, that is persons who are not citizens of the United States, before the U.S. Department of Homeland Security, United States Citizenship and Immigration Services (USCIS). Among other things, **SIMPSON LLOYD GOODMAN** represented aliens before USCIS when they were applying for various types of visas to enter or remain in the United States to include a U Nonimmigrant Status or U-Visa.

2. To be eligible for a U-Visa, the alien must have (1) been a victim of a certain crime; (2) suffered mental or physical abuse as a result of the crime; and (3) helped law enforcement officials in the investigation and/or prosecution of the crime. In addition to the U-

Visa application (I-918, Petition for U Nonimmigrant Status), applicants are asked to submit a Form I-918 Supplement B, U Nonimmigrant Status Certification form, also known as a Law Enforcement Certification form. The Law Enforcement Certification form is to be completed and signed by the certifying official for the law enforcement agency that investigated and/or prosecuted the crime of which the alien was a victim.

3. U-Visa applications and materials must be sent via mail or courier to the USCIS Vermont Service Center (Vermont Service Center) located in Saint Albans, Vermont.

COUNT 1

4. Beginning on or about December 29, 2012, and continuing through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, IVORY LEE HARRIS, SANJAY RATHILAL PATEL, MAHESHKUMAR MANGALDAS PATEL, ASHABEN MUKESHBHAI PATEL, RAJAN NARESHKUMAR PATEL, GOPALADAS KHODABHAI PATEL, SACHIN KHODIDAS PATEL, and BALDEVBHAI RAMABHAI PATEL**, did intentionally and willfully combine, conspire, confederate, and agree with each other and with others both known and unknown to the Grand Jury, to obtain nonimmigrant visas, or other documents prescribed by statute or regulation as evidence of authorized stay in the United States, knowing it to be forged, counterfeit, altered, or falsely made, or to have been procured by means of any false claim or statement, or to have been otherwise procured by fraud or unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

Manner and Means of the Conspiracy

5. During and in connection with aliens seeking a U-Visa, Law Enforcement Certification forms purporting to certify that aliens were victims of certain crimes, were submitted to USCIS along with the U-Visa applications. These Law Enforcement Certification forms contain the description of the crimes. These forms fraudulently listed individuals as victims of a certain crime when they were not victims of the crimes listed.

Overt Acts

6. On or about May 8, 2014, **IVORY LEE HARRIS** prepared a police report listing **SANJAY RATHILAL PATEL** as a victim of a crime in Jackson, Mississippi.

7. On or about September 5, 2014, a form I-918 Supplement B was executed by **IVORY LEE HARRIS** listing **SANJAY RATHILAL PATEL** as a victim of a crime in Jackson, Mississippi.

8. On or about May 15, 2014, **IVORY LEE HARRIS** prepared a police report listing P.M. as a victim of a crime in Jackson, Mississippi.

9. On or about September 15, 2014, a form I-918 Supplement B was executed by **IVORY LEE HARRIS** listing P.M. as a victim of a crime in Jackson, Mississippi.

10. On or about June 23, 2014, a police report was prepared listing **MAHESHKUMAR MANGALDAS PATEL** as a victim of a crime in Jackson, Mississippi.

11. On or about June 30, 2014, a police report was prepared listing T.T. as a victim of a crime in Jackson, Mississippi.

12. On or about December 3, 2014, a form I-918 Supplement B was executed listing

T.T. as a victim of a crime in Jackson, Mississippi.

13. On or about February 20, 2014, **IVORY LEE HARRIS** prepared a police report listing **ASHABEN MUKESHBHAI PATEL** as a victim of a crime in Jackson, Mississippi.

14. On or about August 25, 2014, a form I-918 Supplement B was executed by **IVORY LEE HARRIS** listing **ASHABEN MUKESHBHAI PATEL** as a victim of a crime in Jackson, Mississippi.

15. On or about June 4, 2015, a form I-918 Supplement B was executed listing **RAJAN NARESHKUMAR PATEL** as a victim of a crime in Jackson, Mississippi.

16. On or about June 4, 2015, a form I-918 Supplement B was executed listing **GOPALDAS KHODABHAI PATEL** as a victim of a crime in Jackson, Mississippi.

17. On or about June 4, 2015, a form I-918 Supplement B was executed listing **SACHIN KHODIDAS PATEL** as a victim of a crime in Jackson, Mississippi.

18. On or about June 4, 2015, a form I-918 Supplement B was executed listing **BALDEVBHAI RAMABHAI PATEL** as a victim of a crime in Jackson, Mississippi.

19. On or about July 26, 2015, **IVORY LEE HARRIS** prepared a police report listing C.P. as a victim of a crime in Jackson, Mississippi.

20. On or about October 21, 2014, a U-Visa Packet for **SANJAY RATHILAL PATEL** was mailed from Augusta, Georgia to USCIS in St. Albans, Vermont.

21. On or about October 21, 2014, a U-Visa Packet for P.M. was mailed from Augusta, Georgia to USCIS in St. Albans, Vermont.

22. On or about December 19, 2014, a U-Visa Packet for **MAHESHKUMAR**

MANGALDAS PATEL was mailed from Waynesboro, Georgia to USCIS in St. Albans, Vermont.

23. On or about December 19, 2014, a U-Visa Packet for T.T. was mailed from Waynesboro, Georgia to USCIS in St. Albans, Vermont.

24. On or about August 28, 2014, a U-Visa Packet for **ASHABEN MUKESHBHAI PATEL** was mailed from Waynesboro, Georgia to USCIS in St. Albans, Vermont.

25. On or about August 21, 2015 a U-Visa Packet for **RAJAN NARESHKUMAR PATEL** was mailed from Jackson, Mississippi to USCIS in St. Albans, Vermont.

26. On or about August 21, 2015 a U-Visa Packets for **GOPALDAS KHODABHAI PATEL** and **SACHIN KHODIDAS PATEL** were mailed from Jackson, Mississippi to USCIS in St. Albans, Vermont.

27. On or about August 21, 2015 a U-Visa Packet for **BALDEVBHAI RAMABHAI PATEL** was mailed from Jackson, Mississippi to USCIS in St. Albans, Vermont.

All in violation of Section 371, Title 18, United States Code.

COUNT 2

From on or about April 9, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, IVORY LEE HARRIS, and SANJAY RATHILAL PATEL**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in

any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Form I-918 and Victim Statement, on the basis of obtaining a U-Visa for **SANJAY RATHILAL PATEL**.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 3

From on or about June 23, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, IVORY LEE HARRIS, and MASHESHKUMAR MANGALDAS PATEL**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Form I-918 and Victim Statement, on the basis of obtaining a U-Visa for **MASHESHKUMAR MANGALDAS PATEL**.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 4

From on or about January 28, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN , IVORY LEE HARRIS**, and **ASHABEN MUKESHBHAI PATEL**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Form I-918 and Victim Statement, on the basis of obtaining a U-Visa for **ASHABEN MUKESHBHAI PATEL**.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 5

From on or about December 22, 2014, through the date of this Indictment, in the Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN**, and **RAJAN NARESHKUMAR PATEL**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they

made, submitted and subscribed to Form I-918 and Victim Statement, on the basis of obtaining a U-Visa for **RAJAN NARESHKUMAR PATEL**.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 6

From on or about February 25, 2015, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, GOPALDAS KHODABHAI PATEL**, and **SACHIN KHODIDAS PATEL**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Form I-918 and Victim Statement, on the basis of obtaining a U-Visa for **GOPALDAS KHODABHAI PATEL**, and **SACHIN KHODIDAS PATEL**.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 7

From on or about December 29, 2012, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN**, and **BALDEVBHAI RAMABHAI PATEL**, did willfully and knowingly make, and aided and

abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Form I-918 on the basis of obtaining a U-Visa for **BALDEVBHAI RAMABHAI PATEL**.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 8

From on or about May 15, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, and IVORY LEE HARRIS**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Form I-918 and Victim Statement, on the basis of obtaining a U-Visa for P.M.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 9

From on or about June 24, 2014, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, TARUNKUMAR PURUSHOTTAMBHAI PATEL,** and **SIMPSON LLOYD GOODMAN**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and subscribed to Form I-918 and Victim Statement, on the basis of obtaining a U-Visa for T.T.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 10

From on or about June 16, 2015, through the date of this Indictment, in Hinds County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN,** and **IVORY LEE HARRIS**, did willfully and knowingly make, and aided and abetted others to make, under oath and penalty of perjury, and subscribe as true, any false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit and other document which contains any such false statement; to wit: they made, submitted and

subscribed to Form I-918 and Victim Statement, on the basis of obtaining a U-Visa for C.P.

All in violation of Sections 1546 and 2, Title 18, United States Code.

COUNT 11

1. Beginning on or about June 16, 2015, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL**, **SIMPSON LLOYD GOODMAN**, and **IVORY LEE HARRIS** devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used interstate wire communications for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL**, **SIMPSON LLOYD GOODMAN**, and **IVORY LEE HARRIS** aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain U-Visas from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify police reports and/or falsely use police reports and other documents for the purpose of attempting to obtain U-Visas.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false victim statements to USCIS, in an attempt to obtain a U-Visa.

5. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain a U-Visa.

6. On or about the dates set forth below, for the purpose of executing the scheme and in furtherance of the scheme, or attempting to do so, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, and IVORY LEE HARRIS** aided and abetted by others known and unknown to the Grand Jury, for the purpose of carrying out the scheme to defraud and attempting to do so, did knowingly transmit and cause to be transmitted by means of wire or radio communications in interstate commerce, certain writings, signals or sounds. These transmissions in interstate commerce consisted of a wire transfer set forth below:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
11	08/03/2015	Wire Transfer from Regions Bank, Mobile, Alabama to Bankplus, Yazoo City, Mississippi.	\$15,000.00

All in violation of Sections 1343 and 2, Title 18, United States Code.

COUNT 12

1. Beginning on or about June 16, 2015, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, and IVORY LEE HARRIS**, devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used the U.S. Mails for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL, SIMPSON LLOYD GOODMAN, and IVORY LEE HARRIS**, aided and abetted by others both known and unknown to the Grand Jury, engaged in

and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain U-Visas from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify police reports and/or falsely use police reports and other documents for the purpose of attempting to obtain U-Visas.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false victim statements to USCIS, in an attempt to obtain a U-Visa.

5. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain a U-Visa.

6. That the defendants, **TARUNKUMAR PURUSHOTTAMBHAI PATEL**, **SIMPSON LLOYD GOODMAN**, and **IVORY LEE HARRIS**, on or about August 31, 2015, for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon, from Jackson, Mississippi, to New Orleans, Louisiana, a letter containing certain documents, including a Form I-918-Supp B.

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNT 13

1. Beginning on or about December 22, 2014, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL**, **SIMPSON LLOYD GOODMAN**, and **RAJAN NARESHKUMAR PATEL**, devised and intended to devise a scheme

and artifice to defraud USCIS, and did knowingly use and cause to be used the U.S. Mails for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **SACHIN GIRISHKUMAR PATEL**, **SIMPSON LLOYD GOODMAN**, and **RAJAN NARESHKUMAR PATEL**, aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain U-Visas from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify police reports and/or falsely use police reports and other documents for the purpose of attempting to obtain U-Visas.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false victim statements to USCIS, in an attempt to obtain a U-Visa.

5. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain a U-Visa.

6. That the defendants, **SACHIN GIRISHKUMAR PATEL**, **SIMPSON LLOYD GOODMAN**, and **RAJAN NARESHKUMAR PATEL**, or about August 21, 2015, for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon, from Jackson, Mississippi, to St. Albans, Vermont, a letter containing certain documents, including a Form I-918.

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNT 14

1. Beginning on or about February 25, 2015, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, and GOPALDAS KHODIDAS PATEL**, devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used the U.S. Mails for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, and GOPALDAS KHODIDAS PATEL**, aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain U-Visas from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify police reports and/or falsely use police reports and other documents for the purpose of attempting to obtain U-Visas.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false victim statements to the USCIS, in an attempt to obtain a U-Visa.

5. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain a U-Visa.

6. That the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, and GOPALDAS KHODIDAS PATEL**, or about August 21, 2015, for the

purpose of executing the aforesaid scheme and artifice, and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon, from Jackson, Mississippi, to St. Albans, Vermont, a letter containing certain documents, including a Form I-918.

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNT 15

1. Beginning on or about February 25, 2015, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, and SACHIN KHODIDAS PATEL**, devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used the U.S. Mails for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN, and GOPALDAS KHODIDAS PATEL**, aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain U-Visas from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify police reports and/or falsely use police reports and other documents for the purpose of attempting to obtain U-Visas.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false victim statements to USCIS, in an attempt to obtain a U-Visa.

5. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain a U-Visa.

6. That the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN**, and **GOPALDAS KHODIDAS PATEL** on or about August 21, 2015, for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon, from Jackson, Mississippi, to St. Albans, Vermont, a letter containing certain documents, including a Form I-918.

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNT 16

1. Beginning on or about December 29, 2012, and continuing through the date of this Indictment, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN**, and **BALDEVBHAI RAMABHAI PATEL**, devised and intended to devise a scheme and artifice to defraud USCIS, and did knowingly use and cause to be used the U.S. Mails for the purpose of executing the scheme and attempting to do so.

2. To accomplish its fraudulent purposes, the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN**, and **BALDEVBHAI RAMABHAI PATEL**, aided and abetted by others both known and unknown to the Grand Jury, engaged in and caused various acts and transactions which were designed to and which enabled defendants to attempt to obtain U-Visas from USCIS.

3. It was a part of the scheme and artifice to defraud that the defendants would falsify

police reports and/or falsely use police reports and other documents for the purpose of attempting to obtain U-Visas.

4. It was further a part of the scheme and artifice to defraud that the defendants would submit false addresses and/or other information to USCIS, in an attempt to obtain a U-Visa.

5. That the defendants, **SACHIN GIRISHKUMAR PATEL, SIMPSON LLOYD GOODMAN**, and **BALDEVBHAI RAMABHAI PATEL**, on or about August 21, 2015, for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon, from Jackson, Mississippi, to St. Albans, Vermont, a letter containing certain documents, including a Form I-918.

All in violation of Sections 1341 and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all proceeds obtained directly or indirectly from the offenses.


Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of

any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Sections 981(a)(1)(C) and 982(a)(2)(B), Title 18, United States Code, Section 853(p), Title 21, United States Code and Section 2461, Title 28, United States Code.



GREGORY K. DAVIS
United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED 
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 19th day of April, 2016.



UNITED STATES MAGISTRATE JUDGE